

AUG 27 2014

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS BY DAVID J. MALAND, CLERK
TYLER DIVISION DEPUTY

UNITED STATES OF AMERICA

v.

CHRISTIAN DREW PONCE (01)
BRODERICK CORDELL PIPPINS (02)
HANNAH BETH JAZMIN PONCE (03)
JARRAY RASHAD TODD (04)

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CRIMINAL NO. 6:14CR 47
LED/JDL

SEALED

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

Violation: Title 18, United States Code, §§ 2113(a), 2113(d) and 2 (Bank robbery and Aiding and Abetting)

On or about August 11, 2014, **Christian Drew Ponce, Broderick Cordell Pippins, Hannah Beth Jazmin Ponce, and Jarray Rashad Todd**, aided and abetted by each other and others unknown, did then and there intentionally and knowingly by force, violence and intimidation take from the person and presence of another, property, namely United States currency, belonging to and in the care, custody, control, management, and possession of the Austin Bank, Bar K branch, in Gregg County, Texas, in the Eastern District of Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy

the life of another person by the use of dangerous weapons and devices, to wit: a Winchester, model 120, 12-gauge pump action shotgun, bearing serial number L1399075, in violation of Title 18, United States Code, Sections 2113(a) and (d) and Title 18, United States Code, Section 2.

COUNT 2

Violation: Title 18, United States Code, §§ 924(c) and 2 (Use and carrying of a firearm during a crime of violence and Aiding and Abetting)

On or about August 11, 2014, in the Eastern District of Texas, **Christian Drew Ponce, Broderick Cordell Pippins, Hannah Beth Jazmin Ponce, and Jarray Rashad Todd**, Defendants herein, aided and abetted by each other, and others unknown, did knowingly and intentionally use and carry, and brandish a firearm, to wit: a Winchester, model 120, 12-gauge pump action shotgun, bearing serial number L1399075, during and in relation to and possess in furtherance of a crime of violence for which they and each of them may be prosecuted in a court of the United States, that is bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and (d), as described in Count 1 above, all in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461

As the result of committing one or more of the foregoing offenses a violation of 18 U.S.C. § 2113, or a conspiracy to commit such offense, Defendant herein, shall forfeit to the United States of America pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real or personal, which constitutes or is derived from proceeds traceable to the aforementioned violation[s], including but not limited to the following:

Cash Proceeds

Approximately \$22,305 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the foregoing offenses alleged in this Indictment.

Firearms

a Winchester, model 120, 12-gauge pump action shotgun, bearing serial number L1399075

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or

E. Has been commingled with other property which cannot be subdivided without difficulty,

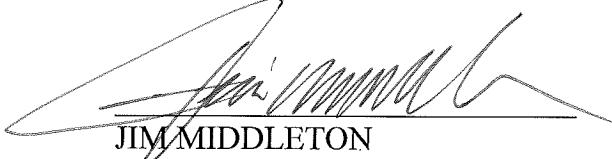
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by Title 28, U.S.C., § 2461(c).

A TRUE BILL,

8-27-2014
Date

BK
Foreperson of the Grand Jury

JOHN M. BALES
UNITED STATES ATTORNEY


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FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA §
V. § CRIMINAL NO. 6:14CR
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JARRAY RASHAD TODD (04) §

NOTICE OF PENALTY

COUNT 1

Violation:	Title 18, United States Code, §§ 2113(a) and 2 (Bank robbery and Aiding and Abetting)
Penalty:	Imprisonment for not more than 25 years; a fine of not more than \$250,000.00; or both, a term of supervised release of not more than 5 years.
Special Assessment:	\$100

COUNT 2

Violation:	Title 18, United States Code, §§ 924(c) and 2 (Possession of a firearm during a crime of violence and Aiding and Abetting)
Penalty:	Imprisonment for a term of not less than 5 years, or not less than 7 years if the firearm is brandished, or not less than 10 years if the firearm is discharged, a fine of not more than

\$250,000, or both. A term of supervised release of at least 5 years.

If a person is convicted of a second or subsequent violation of this section, imprisonment shall be for a term of not less than 25 years.

Any person convicted of this violation shall not be placed on probation and no term of imprisonment shall run concurrently with any other term of imprisonment.

Penalty Basis: Title 18, United States Code, Section 924(c)(1)(A)(I-iii)(B) and (D)

Special Assessment: \$100